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May 6, 1996

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**MAY - 6 1996**

**EX PARTE**

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF SECRETARY

Mr. William Caton  
Acting Secretary  
Federal Communications Commission  
1919 M Street, N.W.  
Washington, D.C. 20554

**Re: CC Docket 96-21 / BOC Out of Region Interstate, Interexchange Services**  
**CC Docket 96-98 - Interconnection Provisions of Telecom Act of 1996**

Dear Mr. Caton:

On May 3, 1996, Bell Atlantic met with Chairman Reed Hundt and John Nakahata; Gina Keeney and Richard Metzgar from the Common Carrier Bureau; Elliot Maxwell and Greg Rosston from the Office of Plans and Policy. The meeting was to discuss Sections 251 and 252 of the Telecommunications Act of 1996, interconnection and unbundling, and BOC out of region interstate, interexchange services. Bell Atlantic was represented by Edward D. Young, III, Jim Cullen, Aubrey Sarvis and Patrick Hanley.

Due to the late hour at which the meeting concluded, this ex parte could not be filed until today. The attached material was used in the discussions. Please enter this material into the record.

Please call me if you have any questions concerning this matter.

Sincerely,



**Attachments**

cc: R. Hundt  
G. Keeney  
E. Maxwell  
R. Metzgar  
J. Nakahata  
G. Rosston

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## STATUS OF SECTION 252 NEGOTIATIONS

### BELL ATLANTIC REGION

#### ***Types and Number of Carriers in Negotiation Process***

*(carriers identified by name only if they have made public announcement)*

- Seven facilities-based carriers (CAP/CLECs) [MFS, TCG, Eastern TeleLogic, MCImetro, three others] with footprints covering all states but WV
- Two facilities-based carriers (cable) with primary footprints in Virginia, affiliates in other states
- Nine resellers (most are IXC's) [AT&T, eight others] with footprints covering 7 states
- Two facilities-based carriers (PCS/cellular) with footprints in 4 states (not DE, NJ, WV)
- One cable company proposing to use our facilities to compete in independent territory in PA

#### ***Major Negotiation Issues to Date***

- Facilities-based carriers
  - ◊ Pricing standards: whether unbundled elements must be priced at incremental cost, or can include shared/common costs and reasonable profit; prices for call termination, unbundled loops, interim number portability, white pages listings
  - ◊ Degree of unbundling requested by IXC's: whether unbundling beyond loops, switching, transport, and signaling is currently feasible
  - ◊ Start-up costs for new carriers: variety of facilities required to provide full service at beginning of operations
- Resale carriers
  - ◊ Access charges: attempts by IXC's to use Act to reduce access charges

May 3, 1996

- ◇ Discount levels from resale: statutory avoided cost standard or arbitrary discounts
- ◇ Operational: extent to which network operations must be redesigned to hide resale role from consumers
- Negotiation process
  - ◇ Confidentiality of negotiation proposals: Bell Atlantic has requested Non-Disclosure Agreements to encourage both sides to explore compromises that deviate from their litigation positions; most negotiating parties have agreed, several have proposed their own NDAs acceptable to Bell Atlantic; Bell Atlantic negotiating regardless of whether NDA signed

***Prospects, to date***

- Facilities-based carriers: good prospect of reaching negotiated agreements with some facilities-based carriers by mid-year -- strongest candidates so far include both CAP/CLECs and cable
- Resellers: good prospect of reaching negotiated agreements with some resellers before end of summer
- Some parties adhering to extreme litigation positions -- likely to generate arbitration

***Earliest Dates to Start State Arbitration (if needed)***

- Late June to mid-July

## STATUS OF UNBUNDLING ISSUES

### BELL ATLANTIC REGION

#### *Unbundled Elements Suggested by Some Carriers*

- **Local Loop**
  - ◇ Feasible now; currently tariffed and in service in Maryland
- **Sub-Loop Elements** (feeder, distribution, field concentrator, NID)
  - ◇ Not yet available; technical feasibility under review (arranging field feasibility test with major IXC)
  - ◇ Equipment manufacturers determining magnitude of development effort and cost involved
- **Local Switching**
  - ◇ Unbundled "port" that permits use of all current switch capabilities feasible, but not yet tested; tariffed in Maryland; Bell Atlantic seeking technical trial partner(s)
  - ◇ AT&T/Comptel "platform" conceptual proposal not within current capability of switches; Bell Atlantic examining development effort that would be required
  - ◇ "Triple-PIC" capability sought by some carriers (ability to send any local call over interoffice trunks owned by any carrier) not available or under development for any switch
- **Trunkside Local Transport**
  - ◇ Currently available in form of unbundled transport under Local Transport Restructure and collocation; currently being used by co-carriers in Maryland and Pennsylvania
- **Tandem Switching**
  - ◇ Currently available in form of unbundled tandem switching under Local Transport Restructure; in use in Maryland and Pennsylvania

May 3, 1996

- **Network Interconnection for Call Termination**

- ◊ Currently available in form of call termination at tandem or end office; in service in Maryland and Pennsylvania
- ◊ Bell Atlantic examining feasibility of additional interconnection points (e.g., mid-span meet)

- **SS7 Interconnection**

- ◊ Currently available under tariff in all jurisdictions in form of signaling links and STP ports; being used by co-carriers

- **Access to Databases**

- ◊ Databases necessary for call routing (LIDB, 800/888) currently available under tariff
- ◊ AIN database access/SCP trigger feasibility under study by FCC

- **Operator Call Completion Services**

- ◊ Currently available under tariff and/or contract

- **911/E911**

- ◊ Currently available under tariff and/or contract; in use in Maryland and Pennsylvania

- **Directory Assistance**

- ◊ Currently available under tariff and/or contract; in use in Maryland and Pennsylvania

- **Access to Rights of Way, Poles, Conduit**

- ◊ Currently available under tariff and/or contract; in use in Maryland and Pennsylvania

- **Electrical Power**

- ◊ Currently available for collocated equipment

- **Digital Cross-Connect**

- ◊ Currently available and being used in connection with collocation

- **Data Switching** (frame relay, ATM)

- ◊ Not currently available; development required; being assessed